

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

TAUREAN PROCH, individually and on
behalf of a class of similarly situated
persons,

Plaintiff,

v.

SHERIFF MAT KING,
LIEUTENANT RICHARD OLEJNIK,
LIEUTENANT KYLE ADAMS,
ST. CLAIR COUNTY, MICHIGAN,
SECURUS TECHNOLOGIES, LLC,

Defendants.

Case No. 2:22-cv-12141

Judge: Laurie J. Michelson
Mag. Judge Patricia T. Morris

**INDEX OF EXHIBITS IN SUPPORT OF PLAINTIFF'S OPPOSITION TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

EXHIBIT	DESCRIPTION
1	Deposition of Tracy DeCaussin (November 12, 2024) <i>and</i> Deposition of Tracy Decaussin as 30(b)(6) Representative for Defendant St. Clair County (November 12, 2024)
2	Deposition of Susan Harrod as 30(b)(6) Representative for Securus Technologies, LLC (December 2, 2024)
3	Transcript of Video Recording of Board of Commissioners Meeting (September 21, 2017) <i>(original .mp4 video file will be filed separately pursuant to Electronic Filing Policies and Procedures R19(c))</i>
4	Email from D. Alderdyce, Subject: FW: BOC Memorandum (attaching Memorandum from Captain Tom Bliss) (April 29, 2024)
5	Email from T. DeCaussin, Subject: RE: Telmate/Securus (April 22,

	2022)
6	Expert Report and Affidavit of Dr. Dora Schiro, Ed.D, J.D. (December 20, 2024)
7	Deposition of Richard Olejnik as 30(b)(6) Representative for Defendant St. Clair County (November 11, 2024)
8	Declaration of Taurean Proch (April 3, 2025) ¹
9	Securus Technologies Response to Request for Proposal (January 13, 2017)
10	Email from R. Olejnik, Subject: RE: Drugs in mail (August 23, 2021)
11	Documents Produced by St. Clair County in Response to Public Records Request dated December 11, 2023
12	St. Clair County Board of Commissioners Agenda (with attachment) (September 21, 2017)
13	2017-2019 Securus Commission Reports
14	2020-2024 Contraband Logs
15	2020-2024 Sergeant Pass-On Logs Excerpts (as produced)
16	Email from K. Thomas, Subject: Securus (attaching Second Amendment to the Master Services Agreement) (January 8, 2024)
17	Email from A. Rush, Subject: Securus Text Connect (August 31, 2023)
18	Email from D. Czarnecki, Subject: Re: case 05373159 (June 8, 2022) Email from K. Adams, Subject: Fwd: Tablets issues thus far (August 6, 2021) Email from K. Adams, Subject: Inmate Tablets (August 23, 2021)

¹ Minor child's name has been covered up (p.6) to protect their privacy.

	<p>Email from T. Branch, Subject: RE: Case 07872451 - Submitted (October 13, 2022)</p> <p>Email from D. Czarnecki, Subject: Re: E-messaging (January 25, 2022)</p> <p>Email from L. Fantoli, Subject : Securus Current Issues Meeting - St. Clair County, MI 06351 (January 5, 2024)</p>
19	<p>Email from W. Arrington, Subject: RE: Facility Support - Phone System - Call Not Going Through (April 6, 2024)</p> <p>Email from K. Ciccarello, Subject: FW: A. Scott (May 16, 2022)</p> <p>Email from C. Dickinson, Subject: RE: Visit (May 22, 2024)</p>
20	Securus Facility System User Guide, EMessaging (January 2022)
21	Email from D. McTee, Subject: RE: STC with Word Alert Confirmation (April 1, 2024)
22	Email from K. Adams, Subject: RE: St Clair/Securus Meeting Follow up (July 6, 2023)
23	Declaration of Amy Oilar (March 28, 2025)
24	Declaration of Justin Proch (April 2, 2025)
25	Email from D. Czarnecki, Subject: Complaint (December 9, 2023)